

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA**

FUMA INTERNATIONAL LLC,
an Ohio limited liability company,

Plaintiff/Counterdefendant,

v.

R.J. REYNOLDS VAPOR COMPANY,
a North Carolina corporation,

Defendant/Counterplaintiff.

Civil Action No. 1:19-cv-260

and

Civil Action No. 1:19-cv-660

**JOINT MOTION TO EXTEND THE FACT DISCOVERY DEADLINE BY SIX
DAYS TO COMPLETE DEPOSITIONS**

Through counsel and pursuant to Local Rule 7.3(j), the parties jointly move for a six-day extension of the fact discovery deadline to complete a currently noticed deposition for which the witness's health does not accommodate the current fact discovery cutoff deadline. As cause therefore, the parties show the Court as follows:

- The current fact discovery deadline is July 9, 2020. (*see* Dkt. 105). The parties have encountered a minor delay in coordinating and scheduling a remaining fact witness deposition due to minor illness of the witness, but believe that they can complete that deposition by July 15, 2020. The parties do not wish to extend the fact discovery deadline for any other purposes.
- The requested extension is made in good faith and not for purposes of undue delay, and should not impact any of the other case deadlines.

WHEREFORE, the parties respectfully request a six-day extension to the discovery deadline up through and including July 15, 2020.

Dated: July 6, 2020

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that all counsel of record who are deemed to have consented to electronic service are being served with a copy of this through the Court's CM/ECF system on July 6, 2020.

Dated: July 6, 2020

/s/ John F. Morrow, Jr.
John F. Morrow, Jr.